

## Remarks

As stated above, Applicants appreciate the Examiner's thorough examination of the subject application and request reexamination and reconsideration of the subject application in view of the following remarks.

In the subject application, claims 1-9, 11, and 14-17 and 28 are pending, of which claim 1 is an independent claim, and claims 2-9, 11, 14-17, and 28 are dependent. With this amendment, Applicants have amended claim 1. Further, Applicants have cancelled claim 15. Applicants respectfully submit that no new matter is believed to have been added as a result of this amendment.

## Specification

The Examiner has objected to the specification under 37 C.F.R. § 1.75(d)(1) and MPEP § 608.01(o) for failing to provide proper antecedent basis for the claimed subject matter. *See* the subject action, page 3. More specifically, the Examiner appears to believe that the specification does not provide proper antecedent basis for the phrase "computer readable medium" recited in Applicants' claims. Applicants respectfully disagree. Applicants have provided 37 C.F.R. § 1.75(d)(1) below for the Examiner's convenience:

(d)(1) The claim or claims must conform to the invention as set forth in the remainder of the specification and the terms and phrases used in the claims must find clear *support or antecedent basis* in the description so that the meaning of the terms in the claims may be ascertainable by reference to the description.. (*See* 37 C.F.R. 1.75(d)(1); emphasis added.)

Applicants respectfully submit that the term "computer readable medium" finds *clear support* in the specification such that "the meaning of the terms in the claims may be ascertainable by reference to the description", as required by 37 C.F.R. § 1.75(d)(1). As

discussed below, Applicants respectfully submit that the specification of the subject application discloses at least that instructions to perform operations recited in Applicants' claims may be included on a memory (i.e., computer readable medium) at least at paragraph [0026] of Applicants' specification, as published.

Applicants' specification discloses that the instructions may be included on a memory (i.e., computer readable medium). Applicants respectfully submit that those of ordinary skill in the art would understand that Applicants' memory may be a computer readable medium. Therefore, Applicants respectfully submit that the term "computer readable medium" finds *clear support* in the specification such that "the meaning of the terms in the claims may be ascertainable by reference to the description". See 37 C.F.R. § 1.75(d)(1). As such, Applicants respectfully request withdrawal of the rejection of the specification under 37 C.F.R. § 1.75(d)(1) and MPEP § 608.01(o).

### ***Claim Rejections – 35 U.S.C. § 101***

Claims 1-9, 11, 14-17 and 28 stand rejected under 35 U.S.C. § 101 because the Examiner appears to believe that the claimed invention is directed to non-statutory subject matter. More specifically, the Examiner appears to believe that "the claims can be broadly interpreted as embodying both tangible embodiments (e.g., storage medium) and intangible embodiments (e.g., transmission medium), and thus non-statutory". See the subject action, page 3. Applicants respectfully disagree.

However, in order to accelerate prosecution of the subject application, Applicants have amended independent claim 1 to recite "[a] computer program residing on a non-transitory computer readable medium having a plurality of instructions, which, when executed by a

processor, cause the processor to perform operations comprising . . . ". *See* Applicants' independent claim 1, as amended. As such, Applicants respectfully submit that independent claim 1, and remaining dependent claims 2-9, 11, 14-17, and 28 which depend, either directly or indirectly, from independent claim 1, do not embody intangible embodiments. Therefore, Applicants respectfully request withdrawal of the rejection of claims 1-9, 11, 14-17 and 28 under 35 U.S.C. § 101.

### ***Claim Rejections – 35 U.S.C. § 103***

Claims 1-2, 5-7, 9, 11, 14-16, and 28 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Eakin (U.S. Patent Application Publication No. 2004/0167896, hereinafter "Eakin"), in view of "Encapsulated PostScript File Format Specification", Version 3.0, published May 1, 1992 by Adobe Systems Incorporated (hereinafter "ASI"), further in view of Mukundan et al. (U.S. Patent No. 6,901,595, hereinafter "Mukundan"), and further in view of Kim et al. (U.S. Patent Application Publication No. 2002/0065701, hereinafter "Kim"). Applicants respectfully traverse this rejection.

Applicants respectfully disagree with the Examiner's characterization of Eakin. The Examiner appears to believe that Eakin teaches the limitation "the databases interact with the source systems through the base system connectors using web services" of Applicants' cancelled claim 15 in paragraphs [0030], [0036], and [0040]-[0041] of Eakin. *See* the subject action, page 8. Applicants respectfully disagree, and have added at least this feature to amended independent claim 1. For example, paragraph [0036] of Eakin is provided below for the Examiner's convenience:

[0036] The repository layer 120 includes an application servlet 122 and a repository manager 124 that integrates digital assets 110 via asset storage 126 and metadata store 128. Servlets are a popular component used in building web applications. **Servlet technology provides web service developers with a simple consistent mechanism for extending the functionality of existing business systems accessible to end users via a web server.** Servlets provide a component-based platform independent method for building web applications without the performance limitations inherent in the common gateway interface (CGI--a web scripting facility). (See Eakin, paragraph [0036], as published).

Applicants are unable to find any reference to "web services" in these portions of Eakin relied on by the Examiner. Specifically, Applicants respectfully submit that the Examiner appears to confuse "the databases interact with the source systems through the base system connectors using *web services*" limitation of Applicants' claim 15 with "[s]ervlet technology provides *web service developers* with a simple consistent mechanism for extending the functionality of existing business systems accessible to end users via a web server" as recited above in Eakin. Therefore, Applicants respectfully submit that Eakin does not teach at least the limitation "the databases interact with the source systems through base systems connectors using *web services*" as recited in Applicants' cancelled claim 15.

However, in an effort to accelerate prosecution of the subject application, Applicants have amended independent claim 1 to include the "web services" feature of cancelled claim 15 as well as further subject matter from Applicants' specification. Applicants' newly amended independent claim 1 is provided below for the Examiner's convenience:

1. (Currently Amended) A computer program residing on a non-transitory computer readable medium having a plurality of instructions, which, when executed by a processor, cause the processor to perform operations comprising:

connecting a portal to one or more user interface (UI) components;

linking one or more interface (UI) components to a repository layer including databases and a connectivity layer through an object access layer, the repository layer including metadata pertaining to roles, work sets and personalization information, the

metadata configured to interact with at least one template, the at least one template providing a format of information according to preset conditions, the at least one template configured to interact with Web application server (WAS) processes and core restructuring processes;

linking the repository layer and the connectivity layer to source systems, the databases of the repository layer configured to interact with the source systems through base system connectors using web services, the web services including simple object access protocol, the base system connectors including an encapsulated postscript interface;

accessing a database that includes data representing multiple enterprise functions, wherein the data representing multiple enterprise functions includes personal tasks and resources for users; and

using one or more object modeling tools, one or more process modeling tool, and the one or more UI component to build components of cross-functional applications from the data representing multiple enterprise functions, wherein the cross-functional applications include pages that display the personal tasks and resources for users.

(See Applicants' amended claim 1; emphasis).

As indicated above, Applicants' newly amended claim 1 recites, in part, "linking the repository layer and the connectivity layer to source systems, the databases of the repository layer configured to interact with the source systems through base system connectors *using web services, the web services including simple object access protocol*, the base system connectors including an encapsulated postscript interface". See Applicants' amended claim 1, emphasis added. Support for Applicants' amendment to claim 1 may be found at least at paragraph [0053] of the subject application, as published. Paragraph [0053] of the subject application, as published, is provided below for the Examiner's convenience:

**[0053] In embodiments, the databases and repositories in the persistence/repository layer 610 interact with the source systems 614 through base system connectors 615 using a markup language such as extensible markup language (XML), web services such as Simple Object Access Protocol (SOAP), request for comments (RPC), or Transmission Control Protocol/Internet Protocol (TCP/IP). The source systems of one organization can interact with the source systems of another organization through a firewall 617. (See the subject application, paragraph [0053], as published).**

Applicants respectfully submit that none of the cited references teach the limitation "linking the repository layer and the connectivity layer to source systems, the databases of the repository layer configured to interact with the source systems through base system connectors *using web services, the web services including simple object access protocol*, the base system connectors including an encapsulated postscript interface". See Applicants' amended claim 1. As such, Applicants respectfully submit that the cited references fail to teach each and every limitation of Applicants' newly amended claim 1. Therefore, Applicants respectfully submit that newly amended claim 1 is in condition for allowance. Since the remaining claims depend, either directly or indirectly, from Applicants' amended claim 1, Applicants respectfully submit that those claims are in condition for allowance as well. Accordingly, withdrawal of the rejections to claims 1-9, 11, 14-17, and 28 under 35 U.S.C. § 103 is respectfully requested.

Applicants note that Examiner has rejected claims 3-4 under 35 U.S.C. § 103(a) as being unpatentable over Eakin-ASI-Mukundan-Kim as applied to claim 1 in view of WAP Forum, "Wireless Application Protocol White Paper", June 200, and claims 8 and 17 as being unpatentable over Eakin-ASI-Mukundan-Kim in view of Bazinet et al. (U.S. Patent No. 7,260,617, hereinafter "Bazinet"). Applicants respectfully submit that these rejections are moot in light of the amendment and discussion above. Accordingly, withdrawal of the rejections to claims 3-4, 8 and 17 under 35 U.S.C. § 103 is respectfully requested.

Having overcome all of the outstanding rejections, Applicants respectfully submit that the subject application is now in condition for allowance. Applicants believe that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for

patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper.

In light of the above remarks, Applicants respectfully assert that the subject application is in condition for allowance. While Applicants respectfully assert that the subject application is now in condition for allowance, the Examiner is invited to telephone Applicants' attorney (617-305-2129) to facilitate prosecution of this application. Please apply any charges or credits to deposit account 50-2324.

Respectfully submitted,

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